

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

Sungchan Song, Hanna Song, Karen Lucas-
Barros, and Aseo Jo,

Plaintiffs,

vs.

Kensington International, Inc., John Gelin,
Eyan Edwards, Rhina Hernandez, and The
Business Buyers Club, LLC,

Defendants.

Case No. 1:21-cv-00543-HG-TAM

**REQUEST FOR CERTIFICATE OF
DEFAULT**

TO: BRENN A B. MAHONEY
UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

Please enter the default of defendants Kensington International, Inc., John Gelin, Rhina Hernandez, and The Business Buyers Club, LLC, pursuant to Rule 55(a) of the Federal Rules of Civil Procedure for failure to plead or otherwise defend this action as fully appears from the court file herein and from the attached Declaration of Joshua L. Crowell in Support of Request for Certificate of Default.

Dated: April 11, 2023

CROWELL LAW FIRM

By: /s/ Joshua L. Crowell

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